

Hanford Advisory Board Draft Advice

Topic: Hanford Long-Term Stewardship Program Plan

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Originating Committee: River & Plateau

Version #1: **Color:** X pink

Background

The Hanford Advisory Board (Board) appreciates the opportunity to provide early input into the development of, and to provide comments on, the Preliminary Draft of the Hanford Long-Term Stewardship (LTS) Program Plan (Plan), Revision C, dated February 25, 2010.

Over seven years ago, on December 6, 2002, the Board provided Consensus Advice #141, “Long-Term Stewardship Plan”ⁱ which provided the Board comments on the previous version of this program plan. The principles expressed in that advice and other related Board adviceⁱⁱ remain appropriate and valid today. The basis for the Board’s advice has been consistent and unwavering for the permanent retrieval, treatment and disposal of all production and restoration mission hazards, and to protect and preserve human, biological, natural and cultural resources in a manner that does not impose a burden on future generations.

As the Hanford Site (Site) cleanup has progressed, the Board has had to acknowledge that extensive areas of the Site will remain contaminated after the completion of active remediation activities. These areas will require surveillance and maintenance of controls, access control and safeguards, system updates and periodic reviews for periods far into the future.

This advice reiterates and augments past advice, tailoring it to this Preliminary Draft of the Plan. The Board recognizes that the Plan is not a “decision document,” rather it describes stewardship obligations and how decision documents “hand off” property and those responsibilities to the LTS Program. The Board also recognizes that some of the comments on the Plan may need to be further addressed in U.S. Department of Energy (DOE) decision documents, national agency policy, or through interagency efforts. Nonetheless, we believe it is appropriate to address them as a part of this Plan review.

Advice

Site Ownership

- The Plan should address the possibility that federal ownership and/or control of the Site in perpetuity may not be realistic. The Board advises that the Plan and related decision documents’ offer, in addition to the assumption of perpetual federal ownership, scenarios that assume a loss of federal control/ownership. The viability of the Plan should be evaluated under these scenarios.
- Under proposed plans to reduce the size of the active cleanup footprint of the Site, options may exist in the foreseeable future for other than federal ownership of unused portions of the Site. The Plan should address this possibility.

Federal Management of LTS Property and Mobile Hazards

- The LTS Program should address DOE responsibly, obligations and plans to respond to contamination that, over time, may migrate beyond the Site boundaries. This discussion

should also include the response for credible natural or man-made events or processes. Any previous agreements or future plans to coordinate with local and state governments regarding monitoring and emergency response procedures should be discussed.

- The Plan should clarify actions that will be taken to address changes in the Site mission, including an expanded role as in interim or long-term storage of Waste Treatment Plant produced glass logs and the spent nuclear fuel currently in storage at the Canister Storage Building.
- The Plan should clarify the process of transitioning land between managing agencies, between DOE offices and site contractors. This process should be fully explained and illustrated in the Plan.
- The Plan should clarify actions that will be taken and the flexibility it will have to address the discovery of further or previously unidentified contamination after remediation activities have been completed and the area turned over to the LTS Program. This includes potential future record of decision (ROD) amendments to return areas to an active remediation status.
- The Plan should fully explain the implications of Natural Resource Damage Assessments (NRDA) decisions to LTS operations and remedy cost.

Funding LTS Obligations

- The Plan should detail specific procedures for a real cost accounting (e.g. cumulative non-discounted cost) in addition to the Net Present Value (NPV) approach. DOE is required by OMB to perform an NPV analysis of the costs of LTS. The effect of this NPV method is that stewardship actions beyond thirty years will cost nothing. This approach is clearly inconsistent with our vision of reducing or eliminating costs to future generations. Given the extremely long periods involved with LTS and the annual nature of the congressional budget process, an improved method which accurately describes the real costs of LTS should be adopted for use in the remedy selection process.
- The Plan should review means to fund LTS actions over the period of performance as alternatives to annual Congressional appropriations. The Board would like assurance that LTS responsibilities of federal and state agencies will be adequately funded.
- The Plan should summarize all stewardship activities and costs. This summary should include all passive and active stewardship responsibilities/actions; and indicate the federal or state office accountable for that activity, estimated annual cost, performance tracking mechanism (such as the five-year review), possible mechanisms of failure (inadequate funding, environmental data loss, etc), and a contingency plan to address these failure modes.
- The Plan primarily discusses routine passive surveillance and maintenance activities to ensure the protectiveness of the cleanup remedies. However, for areas where significant levels of plutonium contamination are allowed to remain, the plan needs to reflect the potential need and the associated costs for active guarded security or continuous human presence on the site.

Remedy Reviews: New Information and Technologies

- The Plan should ensure that new information and technologies that could improve the remedy be periodically assessed, possibly as part of the five-year review process. The Plan should discuss how it would support these technology developments, identification and implementation activities.
- The Plan should describe the process for adopting newly developed remedial and monitoring technologies into existing RODS, especially those that involve returning to an active restoration phase.
- The Plan should describe the process for estimating the reliability of institutional controls and adopting new mechanisms in a manner analogous to failure analyses for engineered controls. The Plan should ensure their incorporation into existing RODs and inform successive remedy revisions.

Information/Knowledge Management

- The Board advises accelerated development of the Hanford Long-Term Stewardship Information Management Plan (LTS IM Plan). The Plan recognizes that a viable information management program is a critical component of the LTS Program. The LTS IM Plan should:
 - Actively involve tribes and stakeholders in the conceptualization and development of the LTS IM Plan.
 - Seek opportunities to pool resources and integrate with existing legacy waste information management programs. This should demonstrate awareness and potential benefits/costs of collaborative strategies.
 - Pursue a collaborative arrangement with the National Park Service to develop the B Reactor Museum as a physical location for stewardship information alongside historical interpretation.
- Continue the moratorium on record destruction to ensure that the critical knowledge base is not lost until all LTS information needs are fully understood.

The Board looks forward to continuing to work with the TPA Agencies to assist with the determination of cleanup decisions and to implement a Long-Term Stewardship Program that is protective of the environment and not a burden on future generations.

ⁱ Hanford Advisory Board Consensus Advice #141, Subject: Long-Term Stewardship Program Plan, Adopted: December 6, 2002

ⁱⁱ Hanford Advisory Board Letter, Subject: Institutional Controls & their Impacts on the Long Term Stewardship of the Hanford Site, dated: February 6, 2009